

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion as to the propriety of the rates and charges set forth in the tariff filings by Verizon – New England, Inc., d/b/a Verizon – Massachusetts

DTE 98-57, Phase III

AT&T’S MOTION FOR EXTENSION OF TIME TO FILE TESTIMONY

AT&T respectfully requests that: (i) the deadline for filing testimony in this phase of the proceeding be extended by one month, from June 21, 2002, to Monday July 22, 2002; and (ii) the hearing date be rescheduled accordingly. The grounds for this request are set forth below.

In a March 7, 2002, letter to the Department, Verizon announced the introduction of “a wholesale end-to-end packet service” that would facilitate the packetizing of data signals for wholesale customers of fiber-fed loops in Massachusetts. In subsequent submissions to the Department, Verizon referred to its proposal as a “PARTS-like” (Packet at the Remote Terminal Service) offering. *See Verizon’s Response to Department’s Request for Comment dated April 9, 2002.* To this point, Verizon has indicated that its new PARTS-like offering will be limited to data signals provided as a Asymmetrical DSL (“ADSL”) service over Verizon-provided DSL line cards. *See Verizon’s Reply Comments, April 25, 2002 at 1.*

Following several rounds of comment from interested parties, the Department reopened Phase III of this docket on May 24, 2002, to examine Verizon’s proposed “PARTS-like” program offerings, and to accept additional evidence regarding the implications of new facts “pertaining to Verizon’s ability to offer PARTS or a PARTS-like service.” *Hearing Officer Memorandum dated May 24, 2002, at 5.* The current schedule requires that all discovery

requests be filed by June 14, 2002, and that testimony be filed by June 21, 2002. The Department scheduled hearings on these matters for June 28, 2002.

The new facts at issue in this phase of the proceeding may have important implications for CLEC access to unbundled network elements and CLEC ability to interconnect with Verizon's network. Verizon has acknowledged that its "future deployment plans may relate to issues raised in [this] proceeding regarding the provision of DSL services at the Remote Terminal ('RT')." *Verizon Letter dated March 7, 2002*. In fact, however, the implications of these future deployment plans – including both what may be in them, and what should be in them but currently are not – may be much broader, affecting general use of unbundled loops, the manner in which unbundled loops will be provisioned, and the manner in which CLECs wishing to deploy their own switching and other facilities may interconnect with Verizon's network in order to use unbundled loops.

In order to provide its new "PARTS-like" service, Verizon has announced that it will begin to make several changes to its local network configuration to facilitate the packetizing of data signals at remote terminals and subsequent transmission of those signals to Verizon central offices using Asynchronous Transfer Mode (ATM) technology. *See attachment to Verizon's Letter dated March 7, 2002*. Once these signals arrive at the central office, they will be transferred to an Optical Concentration Device (OCD), at which point data signals will be handed off to CLECs via an OC-3 or DS-3 interface. *Id.* These packetized data signals will be routed electronically to CLECs through the OCD. *Id.*

The efficiencies inherent in the electronic transfer and routing of data signals using ATM and OCD technology are also available for packetized voice services. Yet, Verizon apparently wants to limit the packetizing of the loop signal to data transmission in order to continue the current inefficiencies of hot cuts and manual transfer that have plagued competing local

providers of voice services for years. Following such a strategy, if that is indeed what Verizon intends, would unnecessarily retard the development of facilities-based competition for local voice services in Massachusetts.

AT&T believes that Verizon can, and should be required to, take ATM and OCD technology one small step further and offer to packetize the entire loop signal, including voice and data. Taking advantage of this opportunity would bring a wealth of benefits to Massachusetts telecommunications consumers, as the transfer of voice and data signals between competitors would be made electronically. This electronic access and administration of the loop signal would eliminate the current system of costly, inefficient and inaccurate hot cuts that require the manual movement of copper wiring within central offices. Electronic loop provisioning would be speedy and accurate – allowing Massachusetts consumers to change carriers easily. Furthermore, such network architecture would promote the development of facilities-based local competition by making much more feasible the connection of CLEC-owned switching and interoffice facilities with Verizon loops.

It is critical that Verizon offer access to the full capabilities of ATM technology so that both voice and data loop signals may be packetized. Otherwise, Verizon will be able to establish a network configuration that will injure any future attempt to packetize voice signals, thus stifling the development of facilities based competition in Massachusetts.

In order to further explore Verizon's plans and the opportunity for a more efficient and competitive local telecommunications market, AT&T has filed discovery requests upon Verizon. In order to fully explore these issues within its prefiled written testimony, however, AT&T will require a one-month extension until July 22, 2002. This will be necessary for several reasons. First, it is expected that Verizon will require some extra time to fully respond to the discovery requests AT&T has filed today. Second, AT&T will need to receive and thoroughly analyze

Verizon's responses to the discovery requests filed today prior to the preparation of this unprecedented testimony. Third, AT&T's lead counsel on this matter, Ken Salinger, will be out of the country from July 1, 2002 to July 9, 2002.

For the reasons stated above, AT&T respectfully requests a one-month extension of the deadline for filing of testimony until July 22, 2002, and a corresponding rescheduling of the further hearings in this proceeding.

Respectfully submitted,

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June 10, 2002